

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

DEVRY INC., and	)	
GLOBAL EDUCATION	)	
INTERNATIONAL, INC.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Case No.
	)	
UNIVERSITY OF MEDICINE AND	)	FILED: JUNE 6, 2008
HEALTH SCIENCES – ST. KITTS,	)	08CV3280
	)	JUDGE COAR
Defendant.	)	MAGISTRATE JUDGE KEYS

**COMPLAINT** EDA

Plaintiffs, DeVry Inc. and Global Education International, Inc. (collectively “Plaintiffs”), for their complaint against Defendant, University of Medicine and Health Sciences – St. Kitts (“Defendant” or “UMHS”), allege as follows:

**JURISDICTION AND VENUE**

1. This is an action for trademark infringement, unfair competition, and related state law claims, which related claims arise out of the same operative facts.
2. This court has jurisdiction pursuant to 15 U.S.C. §1121, 28 U.S.C. §1331, 28 U.S.C. §1338 and 28 U.S.C. §1367.
3. Venue is proper in the Northern District of Illinois under 28 U.S.C. §1391 because, *inter alia*, Defendant’s intentional tortious activities have caused damage to Plaintiffs, and in particular DeVry Inc., which resides in this District, and Defendant is doing business in this District.

**THE PARTIES**

4. Plaintiff, DeVry Inc. (“DeVry”), is a Delaware corporation having an address of One Tower Lane, Oakbrook Terrace, Illinois 60181.

5. Plaintiff, Global Education International, Inc. (“Global”), is a corporation organized under the laws of Barbados having an address of Parker House, Wildey Business Park, Wildey Road, St. Michael, Barbados. Global is a subsidiary of DeVry.

6. On information and belief, UMHS is an educational institution which maintains an administrative office at 460 W. 34<sup>th</sup> Street, 12<sup>th</sup> Floor, New York, New York 10001.

7. This Court has personal jurisdiction over UMHS, *inter alia*, pursuant to 735 ILCS 5/2-209 in that UMHS has committed an intentional tortious act in the State of Illinois which constitutes the subject matter of this action, and has transacted business within the State of Illinois.

**FACTUAL BACKGROUND**

8. Plaintiffs, through their related companies, own and operate a medical school under the name Ross University School of Medicine and a veterinary school under the name Ross University School of Veterinary Medicine (collectively, “Ross University”).

9. Global is the owner of the trademarks and service marks ROSS and ROSS UNIVERSITY, relating to educational services and related goods and services.

10. Global is the owner of U.S. Trademark/Service Mark Registration No. 2,990,127 for the mark ROSS for, among other things, “educational services, namely, conducting continuing education courses of instruction in the fields of medicine and veterinary medicine and conducting courses of instruction for the training of medical and veterinary assistants.”

11. A copy of Registration No. 2,990,127 is attached as Exhibit A.

12. Global is the owner of U.S. Trademark/Service Mark Registration No. 2,939,564 for the mark ROSS UNIVERSITY and Design for, among other things, “educational services, namely, conducting courses of instruction in the fields of medicine and veterinary medicine” and “placement services.”

13. A copy of Registration No. 2,939,564 is attached as Exhibit B.

14. Global is the owner of U.S. Trademark/Service Mark Registration No. 3,043,741 for the mark ROSS UNIVERSITY for, among other things, “educational services, namely, conducting courses of instruction in the fields of medicine and veterinary medicine” and “career placement services.”

15. A copy of Registration No. 3,043,741 is attached as Exhibit C.

16. Global is the owner of U.S. Trademark/Service Mark Registration No. 3,043,743 for the mark ROSS for, among other things, “educational services, namely, conducting courses of instruction in the fields of medicine and veterinary medicine” and “career placement services.”

17. A copy of Registration No. 3,043,743 is attached as Exhibit D.

18. Global is the owner of U.S. Trademark/Service Mark Registration No. 3,098,546 for the mark ROSS UNIVERSITY for, among other things, “educational services, namely, conducting continuing education courses of instruction in the fields of medicine and veterinary medicine and conducting courses of instruction for the training of medical and veterinary assistants.”

19. A copy of Registration No. 3,098,546 is attached as Exhibit E.

20. Global is the owner of U.S. Trademark/Service Mark Registration No. 3,237,762 for ROSS UNIVERSITY and Design for, among other things, “educational services, namely,

conducting continuing education courses of instruction in the fields of medicine and veterinary medicine and conducting courses of instruction for the training of medical and veterinary assistants.”

21. A copy of Registration No. 3,237,762 is attached as Exhibit F.

22. Global, through its predecessors in interest, has been using the marks ROSS and ROSS UNIVERSITY since long before UMHS existed.

23. Ross University medical school offers and renders educational courses to medical students to prepare them for a career in medicine.

24. Ross University medical school is advertised and promoted under the ROSS mark and the ROSS UNIVERSITY mark throughout the United States, including the State of Illinois.

25. Plaintiffs’ primary market for the Ross University medical school is the U.S.

26. Plaintiffs’ medical school services are directed to U.S. customers.

27. Ross University veterinary school offers and renders educational courses to veterinary medical students to prepare them for a career in veterinary medicine.

28. Ross University veterinary school is advertised and promoted under the ROSS mark and the ROSS UNIVERSITY mark throughout the United States, including the State of Illinois.

29. Plaintiffs’ primary market for the Ross University veterinary school is the U.S.

30. Plaintiffs’ veterinary school services are directed to U.S. customers.

31. Plaintiffs, through their related companies, have continuously used the ROSS mark in commerce to identify and distinguish their goods and services from the goods and services of others.

32. Plaintiffs, through their related companies, have continuously used the ROSS

UNIVERSITY mark in commerce to identify and distinguish its goods and services from the goods and services of others.

33. Plaintiffs, through their related companies, have expended time, money, effort and resources in advertising and promoting throughout the United States the goods and services offered under the ROSS and ROSS UNIVERSITY marks, including the State of Illinois.

34. ROSS is a distinctive mark.

35. ROSS UNIVERSITY is a distinctive mark.

36. The ROSS mark is distinctive of educational services in the fields of medicine and veterinary medicine.

37. The ROSS UNIVERSITY mark is distinctive of educational services in the fields of medicine and veterinary medicine.

38. Defendant UMHS is a newly formed medical school.

39. UMHS began promoting its medical school educational services in or about September of 2007.

40. UMHS originally stated that it would begin classes in January of 2008, but actually began classes in May of 2008.

41. On information and belief, UMHS has promoted its educational services within the State of Illinois, including at the Benedictine University Health Professions Fair on March 26, 2008, in Lisle, Illinois.

42. UMHS shares a campus in the Caribbean nation of St. Kitts and Nevis with a nursing school which has been named “International University of Nursing” or “Robert Ross International University of Nursing” (“IUON”) at various times over the past three years.

43. The combined UMHS/IUON campus is located on land near the Ross University

School of Veterinary Medicine campus.

44. On information and belief, UMHS and IUON share most or all of the same ownership group, administrators, and administrative offices.

45. Plaintiffs and IUON are engaged in litigation captioned “DeVry Inc. and Global Education International, Inc. v. International University of Nursing d/b/a Robert Ross International University of Nursing,” No. 06-cv-03364 in the United States District Court for the Northern District of Illinois (the “IUON Action”). The IUON Action includes trademark infringement and unfair competition claims that, among other things, IUON is unfairly trading on the established reputation of Ross University.

46. UMHS uses the designation “Ross” in a trademark sense in the advertising and promotion of its medical school to potential students in the United States.

47. UMHS has promoted its medical school services using letterhead which contains the logo “UMHS – Founded by Dr. Robert Ross.” A copy of that letterhead is attached as Exhibit G.

48. A sign at the entrance to the combined UMHS/IUON campus states “Founded by Dr. Robert Ross.” A photograph of that sign is attached as Exhibit H.

49. UMHS has made numerous statements which trade on the reputation of Ross University.

50. UMHS has stated or implied that the success of Ross University means that UMHS will be a success as well.

51. The first text page of a UMHS printed brochure focuses on the past success of Ross University and mentions Ross University four separate times. A copy of this brochure is attached as Exhibit I.

52. At various times, the home page of the internet web site for UMHS has also began with a focus on the past success of Ross University, including mentioning Ross University four separate times. A copy of that web page is attached hereto as Exhibit J.

53. Job position advertisements for UMHS faculty have stated that UMHS is “established by the founder and former owner of Ross University School of Medicine.” These advertisements also instruct applicants to reply to an e-mail address at the “ross-central.com” domain, implying UMHS is run by the “central” administration of Ross University. Copies of three of these advertisements are attached as Exhibit K.

54. A letter from UMHS President Warren Ross to perspective students discusses the past success of Ross University and mentions Ross University four separate times within two paragraphs. A copy of that letter is attached hereto as Exhibit L.

55. UMHS is not associated with, sponsored by, approved by, or otherwise connected with Plaintiffs, or Ross University School of Medicine, or Ross University School of Veterinary Medicine.

56. As a result of UMHS’s activities, there has been actual confusion by the relevant public as to the source or sponsorship of UMHS’s goods and services.

57. On September 28, 2007, a registered user of the internet web site *ValueMD.com* posted a message to a community forum dedicated to UMHS on that site. The user, having the screen name “eastern2western,” stated “I think Ross should have just merged his new buildings [i.e. the UMHS/IUON campus] with the old school instead of starting everything from scratch again because it take a while to get accepted by the different states.” This statement shows an erroneous belief that UMHS and Ross University (Mr. Ross’s “old school”) were then affiliated and under the same ownership. A print-out of the relevant discussion thread is attached hereto as

Exhibit M.

**COUNT I - TRADEMARK INFRINGEMENT**

58. Plaintiffs adopt and reallege paragraphs 1 through 57.

59. The designation “Founded by Dr. Robert Ross” is confusingly similar to ROSS.

60. The designation “Founded by Dr. Robert Ross” is confusingly similar to ROSS UNIVERSITY.

61. UMHS’s use of the designations “Ross” and “Ross University” is confusingly similar to ROSS.

62. UMHS’s use of the designation “Ross” and “Ross University” is confusingly similar to ROSS UNIVERSITY.

63. UMHS’s use of the designation “Ross” and “Ross University” is being done to trade off the goodwill owned by Plaintiffs.

64. UMHS’s medical school services are directly competitive to Plaintiffs’ medical school services.

65. UMHS’s medical school services are related to Plaintiffs’ veterinary school services.

66. UMHS’s services are offered to the same U.S. customers of Plaintiffs’ services.

67. UMHS’s use of the ROSS and ROSS UNIVERSITY marks is likely to cause confusion as to the source or sponsorship of UMHS’s goods and services.

68. UMHS’s use of the phrase “Founded by Dr. Robert Ross” is likely to cause confusion as to the source or sponsorship of UMHS’s goods and services.

69. UMHS’s actions have caused actual confusion as to the source or sponsorship of UMHS’s goods and services.



70. UMHS's use of the designations "Ross" and "Ross University" constitutes trademark infringement in violation of Section 32(a) of the Trademark Act (15 USC §1114(a)).

71. UMHS's actions have caused and, unless restrained by this Court, will continue to cause serious and irreparable injury and damage to Plaintiffs and to the goodwill associated with the ROSS and ROSS UNIVERSITY marks.

72. UMHS's injury to Plaintiffs has been willful and intentional, as the principals of UMHS knew about Global's prior and senior rights in the ROSS and ROSS UNIVERSITY marks by virtue of the IUON Action.

73. Plaintiffs have no adequate remedy at law.

**COUNT II - FEDERAL UNFAIR COMPETITION**

74. Plaintiffs adopt and reallege paragraphs 1 through 73.

75. UMHS is attempting to profit from the goodwill associated with the ROSS and ROSS UNIVERSITY marks.

76. UMHS is attempting falsely to suggest an association with Plaintiffs or to trade on the goodwill of the ROSS and ROSS UNIVERSITY marks.

77. UMHS's use of the designations "Ross" and "Ross University" is likely to cause confusion as to the source or sponsorship of UMHS's goods and services.

78. UMHS's actions are likely to cause confusion as to the source or sponsorship of UMHS's goods and services.

79. UMHS's actions have caused confusion as to the source or sponsorship of UMHS's services.

80. UMHS's actions constitute false representation and false designation of origin in violation of Section 43(a) of the Lanham Act, 15 U.S.C. §1125(a).

81. UMHS's actions have caused and will continue to cause irreparable injury to Plaintiffs unless enjoined by this Court.

82. Plaintiffs have no adequate remedy at law.

**COUNT III - COMMON LAW UNFAIR COMPETITION**

83. Plaintiffs adopt and reallege paragraphs 1 through 82.

84. UMHS's actions constitute unfair competition under the common law.

85. UMHS's actions have caused and will continue to cause irreparable injury to Plaintiffs unless enjoined by this Court.

86. Plaintiffs have no adequate remedy at law.

**COUNT IV - ILLINOIS UNIFORM DECEPTIVE TRADE PRACTICES ACT**

87. Plaintiffs adopt and reallege paragraphs 1 through 86.

88. UMHS's use of the designations "Ross" and "Ross University" is likely to cause confusion as to the source or sponsorship of UMHS's goods and services.

89. UMHS's actions have caused confusion as to the source or sponsorship of UMHS's goods and services.

90. UMHS's actions were willful and intentional, in that they were done with deliberate disregard or reckless indifference to the rights of Plaintiffs.

91. UMHS's actions violate the Illinois Uniform Deceptive Trade Practices Act, 815 ILCS 510/2.

92. UMHS's actions are likely to and did injure Plaintiffs. Those actions have caused and, unless restrained by this Court, will continue to cause serious and irreparable injury and damage to Plaintiffs and to the goodwill associated with the ROSS and ROSS UNIVERSITY marks.

93. Plaintiffs have no adequate remedy at law.

**COUNT V - ILLINOIS CONSUMER FRAUD AND  
DECEPTIVE BUSINESS PRACTICES ACT**

94. Plaintiffs adopt and reallege paragraphs 1 through 93.

95. The violation of the Illinois Uniform Deceptive Trade Practices Act described in Count IV also constitutes a violation of the Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS 505/2.

96. UMHS's conduct is intentional, willful and outrageous, in that it was done with deliberate disregard or reckless indifference to the rights of Plaintiffs.

97. UMHS's actions are likely to and did injure Plaintiffs. Those actions have caused and, unless restrained by this Court, will continue to cause serious and irreparable injury and damage to Plaintiffs and to the goodwill associated with the ROSS and ROSS UNIVERSITY marks.

98. Plaintiffs have no adequate remedy at law.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs, DeVry Inc. and Global Education International, Inc., respectfully request this Court to enter:

1. Judgment for Plaintiffs and against Defendant on Count I for trademark infringement under 15 U.S.C. §1114(a).

2. Judgment for Plaintiffs and against Defendant on Count II for unfair competition in violation of 15 U.S.C. §1125(a).

3. Judgment for Plaintiffs and against Defendant on Count III for unfair competition under the common law.

4. Judgment for Plaintiffs and against Defendant on Count IV for violation of the Illinois Uniform Deceptive Trade Practices Act.

5. Judgment for Plaintiffs and against Defendant on Count V for violation of the Illinois Consumer Fraud and Deceptive Business Practices Act.

6. A preliminary and permanent injunction restraining Defendant, and its heirs, administrators, officers, directors, agents, servants, representatives, employees, parents, subsidiaries, related companies, licensees, successors, assigns, assignees and all persons acting in active concert or participation with Defendant, or on behalf of Defendant, from doing, causing, aiding or abetting any of the following:

- a. engaging in any acts or activities directly or indirectly calculated to trade upon the reputation or goodwill of Plaintiffs or the ROSS and ROSS UNIVERSITY marks, or to unfairly compete with Plaintiffs in any manner;
- b. directly or indirectly infringing the ROSS mark or the ROSS UNIVERSITY mark;
- c. using in the sale, offering for sale, promotion, advertising, and marketing of goods or services or in any advertising, catalogs, letterhead, business cards, promotional items, promotional material, on any web site or other materials in any media whatsoever the mark ROSS or ROSS UNIVERSITY or any mark incorporating "Ross" in such manner so as to cause confusion, or be likely to cause confusion, mistake or deceive Plaintiffs' customers and the public into the belief that the goods or

services offered by Defendant are approved by, sponsored by, or otherwise associated or connected with Plaintiffs;

- d. using in any manner the designation “Ross” or “Ross University” or any other designation or mark that is identical to or confusingly similar to the ROSS or ROSS UNIVERSITY marks, in any font, style, or typeface, as a domain name, directory name, or other such computer address; in buried code or in metatags on any web pages for any web sites owned, maintained, sponsored or approved by, associated with, or under the control of Defendant; or as a keyword purchase for any internet advertising program based on search or key words;
- e. using in any manner the ROSS or ROSS UNIVERSITY trademarks in connection with the sale, advertisement or promotion of Defendant’s goods or services in such a manner that is likely to create the erroneous belief that said goods or services are authorized by, sponsored by, licensed by, approved by, or in some way associated with Plaintiffs;
- f. referring to or otherwise identifying UMHS with the stand-alone tag line “Founded by Dr. Robert Ross;”
- g. referring to or otherwise identifying Robert Ross as the “founder” of Ross University, or any other designation or statement implying that Robert Ross is associated with Plaintiffs, or Ross University medical school or Ross University veterinary school;
- h. otherwise engaging in any other acts or conduct that would cause consumers to believe erroneously that Defendant’s goods or services are

somehow sponsored by, authorized by, licensed by, approved by, or in any other way are associated with Plaintiffs, or Ross University medical school or Ross University veterinary school.

7. An order requiring Defendant to immediately delete and remove all references to Ross University, and all statements identifying Robert Ross as the “founder” of Ross University, from any and all web sites owned, maintained, sponsored or approved by, or otherwise associated with or under the control of Defendant.

8. An order requiring Defendant to account to and pay over to Plaintiffs all gains, profits and advantages derived from Defendant’s service mark infringement, unfair competition and violation of the Illinois Consumer Fraud and Deceptive Business Practices Act.

9. An order requiring Defendant to account to and pay over to Plaintiffs all damages suffered by Plaintiffs as a result of Defendant’s service mark infringement, unfair competition and violation of the Illinois Consumer Fraud and Deceptive Business Practices Act.

10. An order trebling the amount of the award to Plaintiffs, pursuant to 15 U.S.C. §1117(a).

11. An order directing Defendant to pay to Plaintiffs punitive damages under the Illinois Consumer Fraud and Deceptive Business Practices Act due to the intentional, willful and outrageous nature of Defendant’s actions.

12. An order requiring Defendant to pay Plaintiffs’ reasonable attorneys fees, expenses, and costs incurred in this action.

13. An order granting such other relief as this Court may deem just.

Respectfully submitted,

DEVRY INC. and GLOBAL EDUCATION  
INTERNATIONAL, INC.

Date: June 6, 2008

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Attorneys for Plaintiffs  
DEVRY INC. and  
GLOBAL EDUCATION  
INTERNATIONAL, INC.

## Exhibit A



**Int. Cls.: 9, 16, and 41**

**Prior U.S. Cls.: 2, 5, 21, 22, 23, 26, 29, 36, 37, 38, 50,  
100, 101, and 107**

**Reg. No. 2,990,127**

**United States Patent and Trademark Office**

**Registered Aug. 30, 2005**

**TRADEMARK  
SERVICE MARK  
PRINCIPAL REGISTER**

**ROSS**

GLOBAL EDUCATION INTERNATIONAL, INC.  
(BARBADOS CORPORATION)  
PARKER HOUSE  
WILDEY BUSINESS PARK, WILDEY ROAD  
ST. MICHAEL, BARBADOS

FOR: COMPUTER SOFTWARE AND PRERECORDED AUDIO AND VIDEO TAPES AND CD-ROMS FOR USE IN CONDUCTING CONTINUING EDUCATION INSTRUCTION FOR THE HEALTH CARE PROFESSION IN THE FIELDS OF MEDICINE AND VETERINARY MEDICINE AND FOR THE EDUCATIONAL TRAINING OF MEDICAL AND VETERINARY ASSISTANTS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 0-0-1981; IN COMMERCE 0-0-1981.

FOR: PRINTED INSTRUCTIONAL MATERIALS FOR USE IN CONDUCTING COURSES OF INSTRUCTION FOR CONTINUING EDUCATION IN THE FIELDS OF MEDICINE AND VETERINARY MEDICINE AND FOR COURSES OF INSTRUCTION FOR THE TRAINING OF MEDICAL AND VETER-

INARY ASSISTANTS, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 6-20-1982; IN COMMERCE 6-20-1982.

FOR: EDUCATIONAL SERVICES, NAMELY, CONDUCTING CONTINUING EDUCATION COURSES OF INSTRUCTION IN THE FIELDS OF MEDICINE AND VETERINARY MEDICINE AND CONDUCTING COURSES OF INSTRUCTION FOR THE TRAINING OF MEDICAL AND VETERINARY ASSISTANTS, IN CLASS 41 (U.S. CLS. 100, 101 AND 107).

FIRST USE 6-20-1982; IN COMMERCE 6-20-1982.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

SN 76-558,848, FILED 11-10-2003.

ROBERT C. CLARK JR., EXAMINING ATTORNEY

JUDGE COAR

MAGISTRATE JUDGE KEYS

## Exhibit B

**Int. Cls.: 16, 36 and 41**

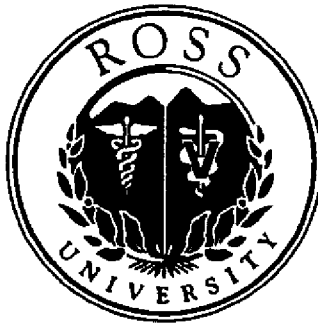
**Prior U.S. Cls.: 2, 5, 22, 23, 29, 37, 38, 50, 100, 101, 102  
and 107**

**Reg. No. 2,939,564**

**United States Patent and Trademark Office**

**Registered Apr. 12, 2005**

**TRADEMARK  
SERVICE MARK  
PRINCIPAL REGISTER**



GLOBAL EDUCATION INTERNATIONAL, INC.  
(BARBADOS CORPORATION)  
PARKER HOUSE  
WILDEY BUSINESS PARK, WILDEY ROAD  
ST. MICHAEL, BARBADOS

FOR: PRINTED INSTRUCTIONAL MATERIALS  
FOR USE IN THE FIELDS OF MEDICINE AND  
VETERINARY MEDICINE, IN CLASS 16 (U.S. CLS. 2,  
5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 0-0-1978; IN COMMERCE 0-0-1978.

FOR: PROVIDING FINANCIAL AID AND PLA-  
CEMENT SERVICES, IN CLASS 36 (U.S. CLS. 100, 101  
AND 102).

FIRST USE 0-0-1978; IN COMMERCE 0-0-1978.

FOR: EDUCATIONAL SERVICES, NAMELY,  
CONDUCTING COURSES OF INSTRUCTION IN  
THE FIELDS OF MEDICINE AND VETERINARY  
MEDICINE, IN CLASS 41 (U.S. CLS. 100, 101 AND  
107).

FIRST USE 0-0-1978; IN COMMERCE 0-0-1978.

NO CLAIM IS MADE TO THE EXCLUSIVE  
RIGHT TO USE UNIVERSITY AND DESIGNS OF  
A CADUCEUS, APART FROM THE MARK AS  
SHOWN.

SER. NO. 76-600,143, FILED 7-1-2004.

ROBERT C. CLARK JR., EXAMINING ATTORNEY

## Exhibit C

**Int. Cls.: 16, 35, 36 and 41**

**Prior U.S. Cls.: 2, 5, 22, 23, 29, 37, 38, 50, 100, 101, 102  
and 107**

**Reg. No. 3,043,741**

**United States Patent and Trademark Office**

**Registered Jan. 17, 2006**

**TRADEMARK  
SERVICE MARK  
PRINCIPAL REGISTER**

**ROSS UNIVERSITY**

GLOBAL EDUCATION INTERNATIONAL, INC.  
(BARBADOS CORPORATION)  
PARKER HOUSE  
WILDEY BUSINESS PARK, WILDEY ROAD  
ST. MICHAEL, BARBADOS

FOR: PRINTED INSTRUCTIONAL MATERIALS  
FOR USE IN THE FIELDS OF MEDICINE AND  
VETERINARY MEDICINE, IN CLASS 16 (U.S. CLS. 2,  
5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 0-0-1978; IN COMMERCE 0-0-1978.

FOR: CAREER PLACEMENT SERVICES, IN  
CLASS 35 (U.S. CLS. 100, 101 AND 102).

FIRST USE 0-0-1978; IN COMMERCE 0-0-1978.

FOR: PROVIDING FINANCIAL AID, IN CLASS 36  
(U.S. CLS. 100, 101 AND 102).

FIRST USE 0-0-1978; IN COMMERCE 0-0-1978.

FOR: EDUCATIONAL SERVICES, NAMELY,  
CONDUCTING COURSES OF INSTRUCTION IN  
THE FIELDS OF MEDICINE AND VETERINARY  
MEDICINE; CAREER COUNSELING, IN CLASS 41  
(U.S. CLS. 100, 101 AND 107).

FIRST USE 0-0-1978; IN COMMERCE 0-0-1978.

THE MARK CONSISTS OF STANDARD CHAR-  
ACTERS WITHOUT CLAIM TO ANY PARTICULAR  
FONT, STYLE, SIZE, OR COLOR.

NO CLAIM IS MADE TO THE EXCLUSIVE  
RIGHT TO USE UNIVERSITY, APART FROM THE  
MARK AS SHOWN.

SER. NO. 76-600,145, FILED 7-1-2004.

ROBERT C. CLARK JR., EXAMINING ATTORNEY

JUDGE COAR

MAGISTRATE JUDGE KEYS

## Exhibit D

**Int. Cls.: 16, 35, 36 and 41**

**Prior U.S. Cls.: 2, 5, 22, 23, 29, 37, 38, 50, 100, 101, 102  
and 107**

**Reg. No. 3,043,743**

**United States Patent and Trademark Office**

**Registered Jan. 17, 2006**

**TRADEMARK  
SERVICE MARK  
PRINCIPAL REGISTER**

**ROSS**

GLOBAL EDUCATION INTERNATIONAL, INC.  
(BARBADOS CORPORATION)

PARKER HOUSE  
WILDEY BUSINESS PARK, WILDEY ROAD  
ST. MICHAEL, BARBADOS

FOR: PRINTED INSTRUCTIONAL MATERIALS  
FOR USE IN THE FIELDS OF MEDICINE AND  
VETERINARY MEDICINE, IN CLASS 16 (U.S. CLS. 2,  
5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 0-0-1978; IN COMMERCE 0-0-1978.

FOR: CAREER PLACEMENT SERVICES, IN  
CLASS 35 (U.S. CLS. 100, 101 AND 102).

FIRST USE 0-0-1978; IN COMMERCE 0-0-1978.

FOR: PROVIDING FINANCIAL AID, IN CLASS 36  
(U.S. CLS. 100, 101 AND 102).

FIRST USE 0-0-1978; IN COMMERCE 0-0-1978.

FOR: EDUCATIONAL SERVICES, NAMELY,  
CONDUCTING COURSES OF INSTRUCTION IN  
THE FIELDS OF MEDICINE AND VETERINARY  
MEDICINE; CAREER COUNSELING, IN CLASS 41  
(U.S. CLS. 100, 101 AND 107).

FIRST USE 0-0-1978; IN COMMERCE 0-0-1978.

THE MARK CONSISTS OF STANDARD CHAR-  
ACTERS WITHOUT CLAIM TO ANY PARTICULAR  
FONT, STYLE, SIZE, OR COLOR.

SER. NO. 76-600,199, FILED 7-1-2004.

ROBERT C. CLARK JR., EXAMINING ATTORNEY

## Exhibit E



**Int. Cls.: 9, 16, and 41**

**Prior U.S. Cls.: 2, 5, 21, 22, 23, 26, 29, 36, 37, 38, 50,  
100, 101, and 107**

**Reg. No. 3,098,546**

**United States Patent and Trademark Office**

**Registered May 30, 2006**

**TRADEMARK  
SERVICE MARK  
PRINCIPAL REGISTER**

**ROSS UNIVERSITY**

GLOBAL EDUCATION INTERNATIONAL, INC.  
(BARBADOS CORPORATION)

PARKER HOUSE  
WILDEY BUSINESS PARK, WILDEY ROAD  
ST. MICHAEL, BARBADOS

FOR: COMPUTER SOFTWARE AND PRERECORDED AUDIO AND VIDEO TAPES AND CD-ROMS FOR USE IN CONDUCTING CONTINUING EDUCATION INSTRUCTION FOR THE HEALTH CARE PROFESSION IN THE FIELDS OF MEDICINE AND VETERINARY MEDICINE AND FOR THE EDUCATIONAL TRAINING OF MEDICAL AND VETERINARY ASSISTANTS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 0-0-1978; IN COMMERCE 0-0-1978.

FOR: PRINTED INSTRUCTIONAL MATERIALS FOR USE IN CONDUCTING COURSES OF INSTRUCTION FOR CONTINUING EDUCATION IN THE FIELDS OF MEDICINE AND VETERINARY MEDICINE AND FOR COURSES OF INSTRUCTION FOR THE TRAINING OF MEDICAL AND VETERINARY ASSISTANTS, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 0-0-1978; IN COMMERCE 0-0-1978.

FOR: EDUCATIONAL SERVICES, NAMELY, CONDUCTING CONTINUING EDUCATION COURSES OF INSTRUCTION IN THE FIELDS OF MEDICINE AND VETERINARY MEDICINE AND CONDUCTING COURSES OF INSTRUCTION FOR THE TRAINING OF MEDICAL AND VETERINARY ASSISTANTS, IN CLASS 41 (U.S. CLS. 100, 101 AND 107).

FIRST USE 0-0-1978; IN COMMERCE 0-0-1978.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE UNIVERSITY, APART FROM THE MARK AS SHOWN.

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**Int. Cls.: 9, 16, and 41**

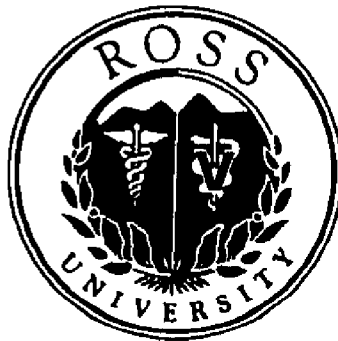
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INARY ASSISTANTS, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

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ROBERT C. CLARK JR., EXAMINING ATTORNEY

## Exhibit G



FOUNDED BY DR. ROBERT ROSS

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NORTH AMERICAN ADMINISTRATIVE OFFICE

460 West 34th. Street, 12th floor • New York, New York 10001

Telephone: 212-868-4720 • Facsimile: 212-279-8640

Email: [NEW\\_EMAIL\\_ADDRESSTO\\_FOLLOWUP@UMHS-SK.ORG](mailto:NEW_EMAIL_ADDRESSTO_FOLLOWUP@UMHS-SK.ORG) • Website: [WWW.UMHS-SK.ORG](http://WWW.UMHS-SK.ORG)

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*MICHIGAN* - 4204 MARTIN ROAD, SUITE B, COMMERCE TWP., MI 48390 • TEL: 248-363-0944 • FAX: 248-363-1105 • [CWALKER@IUON.ORG](mailto:CWALKER@IUON.ORG)

*CALIFORNIA* - 2900 GORDON AVENUE, SUITE 100, SANTA CLARA, CA 95051 • TEL: 408-733-2373 • FAX: 408-733-2377 • [ELMATTINGLEY@IUON.ORG](mailto:ELMATTINGLEY@IUON.ORG)  
19200 VON KARMAN, SUITE 900, IRVINE, CA 92612 • TEL: 949-724-1596 • [JCHAVEZ@IUON.ORG](mailto:JCHAVEZ@IUON.ORG)

## Exhibit H

**UNIVERSITY OF MEDICINE  
AND  
HEALTH SCIENCES  
ST. KITTS  
—&—  
INTERNATIONAL UNIVERSITY OF NURSING  
FOUNDED BY DR. ROBERT ROSS**



# Exhibit I



# University of Medicine and Health Sciences

---

ST KITTS



EDUCATING THE NEXT  
GENERATION OF PHYSICIANS

UMHS™



# LIVE YOUR DREAM

Dr. Robert Ross, founder and former owner of Ross University School of Medicine, is excited to announce the opening of his new medical school in January 2008. Back in 1979, Dr. Ross was one of the first pioneers in developing an off shore medical school. Under his guidance, Ross University grew into one of the largest medical and veterinary schools in the world. His reputation in developing academic institutions and dedication to excellence is

known worldwide. Thousands of students have graduated from Ross and are now licensed and practicing in the United States.

Dr. Ross is no longer affiliated with Ross University, but he does intend to apply his experience, knowledge, and resources in developing the University of Medicine and Health Sciences, St. Kitts (UMHS). We invite you to learn more about making your dream a reality by studying medicine at UMHS.





## THE VISION

Dr. Ross strives for and insists upon academic excellence and quality in every aspect of this new medical school. To assist him in establishing this university, Dr. Ross has assembled a team of consultants and advisors that are leaders in medical education. We will incorporate the best of what U.S. medical schools offer to make UMHS one of the premier medical schools. We have spared no expense in this venture, and have constructed a new state of the art campus on the Island of St. Kitts to help achieve this vision. Unlike many other Caribbean schools, UMHS is dedicated to providing qualified students with an intimate and personalized education. In fact, our faculty will dedicate virtually 100% of their time to students. Our faculty are well credentialed and recruited primarily from U.S. medical schools.

## THE CURRICULUM

The UMHS academic program is both accelerated and rigorous, and is designed to promote educational and professional excellence. Modeled after the U.S. medical schools, we have developed a traditional medical school curriculum that will prepare and qualify students for licensure in the United States.

Since we operate year round, students can complete our 10 semester program in a little over 3 years. The Basic Science portion of the curriculum, semester 1-4, will be offered at our state of the art campus on the beautiful Caribbean Island of St. Kitts. Problem based learning with an emphasis on clinical correlations will be integrated into the basic science program. The Clinical Program, consisting of core and elective rotations, will be completed at our affiliated teaching hospitals in the United States during semesters 5-10. Each semester is approximately 16 weeks in duration. Please check our website periodically for a listing and updates on our clinical program.

The educational program at UMHS is offered year-round. We have three entering classes per year; January, May, and September. Students are accepted on a rolling-admissions basis and we encourage early application. Successful graduates will become valued members of the medical profession and will be fully qualified and eligible to sit for the United States Medical Licensure Examination (USMLE).





- Technologically advanced multipurpose laboratories are fully equipped for Microbiology, Pathology, Physiology and other related classes.
- Smaller classrooms have been developed to offer students a more intimate and personalized education.
- A full-service bookstore is located on campus for student convenience.
- A modern anatomy and neuro-anatomy lab will be constructed and should be fully operational in the first quarter of 2008.

- Two skills laboratories equipped with the latest in computerized simulation models were designed with the functionality of a hospital unit or clinic to enhance the physical diagnosis experience.
- The Anne Ross Library & Learning Resource Center has an impressive collection of books, journals, periodicals, audiovisual materials, educational software and on-line databases, providing the resources vitally necessary for the proper training of today's physician. The LRC is fully equipped with over 36 computers for student use.





Faculty members are primarily recruited from the U.S. They all share a love of teaching, and are skilled and credentialed educators. Their primary goal is to ensure your success as a future physician. As a result, they dedicate virtually 100% of their time to teaching and assisting students.

FINANCIAL AID

The cost of medical education is a concern of students worldwide. Most students that attend medical school finance their education through student loans. The amount of debt students incur is substantial, and should be evaluated prior to applying to each school. We at UHMS understand the significance of debt load, and have purposefully established tuition at a value that makes the academic program, as well as re-payment, affordable. As a result, tuition per semester in the Basic Science Program will be \$7800.

UMHS has established a financial aid program that will help students cover their educational expenses. Student loans and institutional scholarships will be available for those who qualify.

The Office of Financial Aid helps students determine eligibility for available loans and scholarships. Members of the department will work with students to review their options, and determine a plan to finance their education.

ADMISSIONS REQUIREMENTS

UMHS seeks applicants who possess the academic and personal potential to succeed in both completing a highly rigorous course of study, and becoming qualified physicians. The admissions committee bases its decisions on a combination of factors including academic performance in college, cumulative and pre-medical GPA, MCAT scores, letters of recommendation, essay and personal interview. Applicants must complete the following pre-requisites:

General Chemistry with lab	One year
Organic Chemistry with lab	One year
General Biology with lab	One year
Physics with lab	One year
College Level Mathematics	One semester
English	One year



# LIVING IN ST. KITTS

When students need a break from their studies, they will find themselves in a tropical paradise distinguished by breathtaking natural beauty. The resort island of St. Kitts offers many Western-style amenities and serves as a model environment for living and learning. St. Kitts allows students to participate in a lifestyle of cultural diversity, where English is the main language.

The UMHS campus has a vibrant atmosphere, evoking a collegial environment. As part of the student body, individuals find themselves in a rewarding, enriching and diverse peer group. The students, faculty, and staff members are all dedicated to medical education. Adding to the intellectual stimulation are the members of the St. Kitts/Nevis community, who share their local art and culture with the staff and students.

- Support services are provided in the areas of academic advising, counseling, health care, and safety and security.



- UMHS assists students, faculty, and staff members in locating and securing appropriate housing accommodations.
- Students are encouraged to take advantage of island activities including athletics, water sports, and a variety of campus organizations and extracurricular activities.







# University of Medicine and Health Sciences

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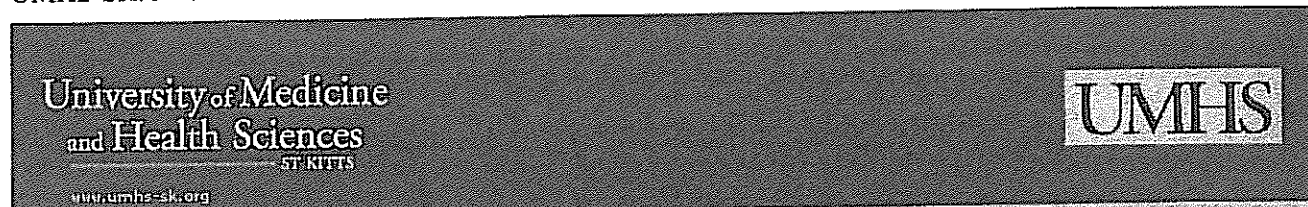
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## Exhibit J



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## EDUCATING THE NEXT GENERATION OF PHYSICIANS

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### WEB UPDATE

The University of Medicine and Health Sciences, St. Kitts will open in January 2008.

Tuition, Financial Aid & Admissions Requirements, are located in the [UMHS-INFO.PDF](#) until the content for our web site is completed.

Sign up for e-mail notifications of updates, and please visit often.

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### LIVE YOUR DREAM



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#### Our facilities include:

- An innovative 210-seat auditorium utilizing audiovisual tools that enhance the quality of education and allow faculty members to present critical visual information in the most creative mode available.
- Two skills laboratories equipped with the latest in computerized simulation models and were designed with the functionality of a hospital ward or clinic to enhance the physical diagnosis experience.
- The Anne Ross Library & Learning Resource Center has an impressive collection of books, journals, periodicals, audiovisual materials, educational software and on-line databases, providing the resources vitally necessary for the proper training of today's physician. The LRC is fully equipped with over 36 computers for student use.
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When students need a break from their studies, they will find themselves in a tropical paradise

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qualify students for licensure in the United States. Since we operate year round, students can complete our 10 semester program in a little over 3 years. The Basic Science portion of the curriculum, semesters 1-4, will be offered at our state of the art campus on the beautiful Caribbean island of St. Kitts. Problem based learning with an emphasis on clinical correlations will be integrated into the basic science program. The Clinical Program, consisting of core and elective rotations, will be completed at our affiliated teaching hospitals in the United States during semesters 5-10. Each semester is approximately 16 weeks in duration. Please check our website periodically for a listing and updates on our clinical program.

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#### Faculty

Faculty members are primarily recruited from the U.S. They all share a love of teaching, and are skilled and credentialed educators. Their primary goal is to ensure your success as a future physician. As a result, they dedicate virtually 100% of their time to teaching and assisting students.

#### Instructional Facilities

During the first 4 semesters on St. Kitts, students find themselves in a model learning environment that sets the standard for modern medical education. The UMHS campus boasts technological advances on the cutting-edge of health care instruction. The wireless and networked campus is a key component to ensure that students are well prepared to complete the educational program. Utilization and understanding of educational software and auto-tutorial learning is emphasized throughout the learning process. All of the classrooms and laboratories are equipped with state-of-the-art audiovisual equipment.

distinguished by breathtaking natural beauty. The resort island of St. Kitts offers many Western-style amenities and serves as a model environment for living and learning. St. Kitts allows students to participate in a lifestyle of cultural diversity, where English is the main language.

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#### Admissions Requirements

UMHS seeks applicants who possess the academic and personal potential to succeed in both completing a highly rigorous course of study, and becoming qualified physicians. The admissions committee bases its decisions on a combination of factors including academic performance in college, cumulative and pre-medical GPA, MCAT scores, letters of recommendation, essay and personal interview. Applicants must complete the following pre-requisites:

- General Chemistry with lab, One year
- Organic Chemistry with lab, One year
- General Biology with lab, One year
- Physics with lab, One year
- College Level Mathematics, One semester
- English, One year

#### University of Medicine and Health Sciences, St. Kitts

North American Administrative Office, 460 West 34th Street, 12th Floor, New York, NY 10001

Toll Free Admissions: 866.686.0380 - New York: 212.860.0855 - E-mail: [admissions@umhs-sk.net](mailto:admissions@umhs-sk.net)

## Exhibit K



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Medical School Faculty

Source: JAMACareerNet.com

Organization: University of Medicine and Health Sciences

Location: Nevis

Last Updated: 9/28/2007

Job Description

**MEDICAL SCHOOL FACULTY** The University of Medicine and Health Sciences, St. Kitts, will be opening our doors to our first MD Program in January 2008. Established by the founder and former owner of the Ross University School of Medicine, this beautiful, 10 acre oceanfront campus on the Caribbean Island of St. Kitts houses a state-of-the-art facility that compares with the best medical schools in the world. In order for UMHS-SK to provide a medical education second to none, we seek only the finest faculty members under the direction of the Provost/Dean of Medicine and invite applications for the following faculty teaching positions: . **BIOCHEMISTRY . PHYSIOLOGY . PATHOLOGY . EMBRYOLOGY . ANATOMY . PHARMACOLOGY . HISTOLOGY & CELL BIOLOGY .** **BIostatistics/EPIDEMIOLOGY** Minimum qualification for these positions is an earned master's degree in subject area. A Doctoral degree is preferred. Recent experience teaching in an accredited MD program in the U.S. is highly desirable. A full description of the positions listed above can be found on our website [www.umhs-sk.org/hr](http://www.umhs-sk.org/hr) We offer a TAX-FREE annual salary, an idyllic environment, and the opportunity to become involved in the growth and success of the institution. We require clinical chairpersons on a part-time basis to visit hospitals throughout the U.S. Please submit a letter of interest, CV and references to: The University of Medicine and Health Sciences, St. Kitts North American Administrative Offices 460 West 34th Street, NY, NY 10001 Fax: 212 279-8640 [www.umhs-sk.org](http://www.umhs-sk.org) email: [MBruce@ross-central.com](mailto:MBruce@ross-central.com)

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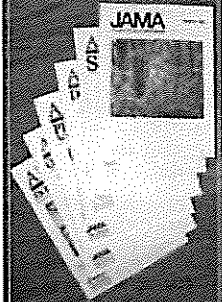
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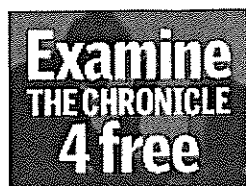
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**Position:** Medical School Faculty

**Salary:** Unspecified

**Institution:** The University of Medicine and Health Sciences, St. Kitts

**Location:** St. Kitts & Nevis

**Date posted:** 9/24/2007

## MEDICAL SCHOOL FACULTY

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In order for UMHS-SK to provide a medical education second to none, we seek only the finest faculty members under the direction of the Provost/Dean of Medicine and invite applications for the following faculty teaching positions:

- . BIOCHEMISTRY
- . PHYSIOLOGY
- . PATHOLOGY
- . EMBRYOLOGY
- . ANATOMY
- . PHARMACOLOGY
- . HISTOLOGY & CELL BIOLOGY
- . BIostatistics/EPIDEMIOLOGY

Minimum qualification for these positions is an earned master's degree in subject area. A Doctoral degree is preferred. Recent experience teaching in an accredited MD program in the U.S. is highly desirable.

A full description of the positions listed above can be found on our Web site [www.umhs-sk.org/hr](http://www.umhs-sk.org/hr)

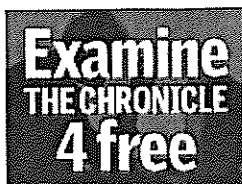
We offer a TAX-FREE annual salary, an idyllic environment, and the opportunity to become involved in the growth and success of the institution.

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**The University of Medicine and Health Sciences, St. Kitts**  
North American Administrative Offices  
460 West 34th Street, NY, NY 10001  
Fax: 212 279-8640  
e-mail: [MBruce@ross-central.com](mailto:MBruce@ross-central.com)

UMHS  
[www.umhs-sk.org](http://www.umhs-sk.org)



## Contact Information:



Fax : 212-279-8640  
The University of Medicine and Health Sciences, St. Kitts  
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## Job Details: Faculty

Title: Education Executive/Management

Location: Caribbean, Saint Kitts and Nevis

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**Description:** Medical School Faculty  
The University of Medicine and Health Sciences, St. Kitts, will be opening our doors to our first MD Program in January 2008. Established by the founder and former owner of the Ross University School of Medicine, this beautiful, 10 acre oceanfront campus on the Caribbean Island of St. Kitts houses a state-of-the-art-facility that compares with the best medical schools in the world.

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EMBRIOLOGY  
. HISTOLOGY & CELL BIOLOGY .  
PHYSIOLOGY .ANATOMY  
. PATHOLOGY . PHARMACOLOGY  
. BIostatistics/EPIDEMIOLOGY

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[www.umhs-sk.org](http://www.umhs-sk.org)

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## Exhibit L

## UNIVERSITY OF MEDICINE AND HEALTH SCIENCES, ST. KITTS

NORTH AMERICAN ADMINISTRATIVE OFFICE

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16 October 2007

Gina Pappas  
2859 Central Street #210  
Evanston Illinois 60201

Dear Gina,

I am proud to announce the opening of the University of Medicine and Health Sciences, St. Kitts (UMHS) in January 2008. We are very excited about our new venture, and have already established a state of the art campus in St. Kitts. In fact, our facilities can compare with some of the best medical schools in the United States. We have spared no expense in this undertaking with the belief that you deserve the best education possible.

For information about our university please visit our website [www.umhs-sk.org](http://www.umhs-sk.org).

As you may know, there is a current shortage of physicians in the United States. In fact, the Center for Health Workforce Studies predicts a shortage of up to 96,000 physicians by the year 2020. As a result of this and other studies, U.S. medical schools are attempting to increase their capacity, but with limited success. According to the AAMC, in 1995, only 16,252 of 48,556 applicants were accepted to US medical schools. In 2006, only 17,370 out of 39,108 applicants were accepted. This data suggests that capacity at U.S. schools has increased marginally, while demand is still significantly high. As a result, many qualified applicants have to seek other alternatives if they want to become physicians.

As a leader in medical education, we understand the existing problem, and have the experience, knowledge and financial resources to provide one of the premier medical schools in the Caribbean. I have set forth below historical information about our founder, Dr. Robert Ross, and have provided further details about UMHS for your consideration.

### Introduction

Dr. Robert Ross, founder and former owner of Ross University School of Medicine, is excited to announce the opening of his new medical school. Back in 1979, Dr. Ross was one of the first pioneers in developing an off-shore medical school. Under his guidance, Ross University grew into one of the largest medical and veterinary schools in the world. His reputation in developing academic institutions and dedication to excellence is known world-wide. Thousands of students have graduated from Ross University and are now licensed and practicing in the United States.

Dr. Ross is no longer affiliated with Ross University, but he does intend to apply his experience, knowledge, and resources in developing the UMHS. Unlike many other Caribbean schools, Dr. Ross is dedicated to providing qualified students with an intimate, personalized, and exceptional education. In fact, our faculty will dedicate virtually 100% of their time to students. Our faculty is well credentialed and recruited primarily from U.S. medical schools.

First and foremost, Dr. Ross strives for and insists upon academic excellence and quality in every aspect of this new medical school. To assist him in establishing this university, Dr. Ross has assembled a team of consultants and advisors that are leaders in medical education. We will incorporate the best of what U.S. medical schools offer to make UMHS one of the premier medical schools educating the next generation of physicians. He has spared no expense in this venture, and has recently constructed a new state of the art campus on the Island of St. Kitts.

### The Curriculum

The UMHS academic program is both accelerated and rigorous, and is designed to promote educational and professional excellence. Modeled after U.S. medical schools, we have developed a traditional medical school curriculum that will prepare and qualify students for licensure in the United States.

Since we operate year-round, students can complete our ten semester program in a little over three years. The Basic Science portion of the curriculum, semesters 1-4, will be offered at our state-of-the-art campus on the beautiful Caribbean Island of St. Kitts. Problem based learning with an emphasis on clinical correlations will be integrated into the basic science program. The Clinical Program, consisting of core and elective rotations, will be completed at our affiliated teaching hospitals in the United States during semesters

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MICHIGAN - 4204 MARTIN RD., SUITE B, COMMERCE TWP., MI 48390 TEL: 248-363-8558, FAX: 248-363-1105 [CWALKER@UMHS-SK.NET](mailto:CWALKER@UMHS-SK.NET)

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CALIFORNIA - 19200 VON KARMAN, SUITE 900, IRVINE, CA 92612 TEL: 949-724-1596 [JCHAVEZ@UMHS-SK.NET](mailto:JCHAVEZ@UMHS-SK.NET)

5-10. Each semester is approximately 16 weeks in duration. The development of our clinical program is ongoing, and we will be posting all new affiliations on our website.

The educational program at UMHS is offered year-round. We have three entering classes per year; January, May, and September. Students are accepted on a rolling-admissions basis and we encourage early application. Successful graduates will become valued members of the medical profession and will be fully qualified and eligible to sit for the United States Medical Licensure Examination (USMLE).

#### Faculty

Faculty members are primarily recruited from the U.S. They all share a love of teaching, and are skilled and credentialed educators. Their goal is to ensure your success as a future physician. As a result, they dedicate virtually 100% of their time to teaching and assisting students.

#### Admissions Requirements

UMHS seeks applicants who possess the academic and personal potential to succeed in both completing a highly rigorous course of study, and becoming qualified physicians. The Admissions Committee bases its decisions on a combination of factors including academic performance in college, cumulative and pre-medical GPA, MCAT scores, letters of recommendation, essay and personnel interview. Applicants must complete the following prerequisites:

General Chemistry with lab	One year	Organic Chemistry with lab	One year
General Biology with lab	One year	Physics with lab	One year
College Level Mathematics	One semester	English	One year

#### Tuition

The cost of medical education is a concern of students worldwide. Most students that attend medical school finance their education through student loans. The amount of debt students incur is substantial, and should be evaluated prior to applying to each school. We at UMHS understand the significance of debt load, and have purposefully established tuition at a value that makes both the academic program and repayment affordable. Tuition per semester in the Basic Science Program will be \$7800.

#### Financial Aid

UMHS has established a financial aid program that will help students pay for their educational expenses. Student loans and institutional scholarships will be available for those who qualify.

The Office of Financial Aid helps students determine eligibility for available loans and scholarships. Members of the department will work with students to review their options and determine a plan to finance their education.

Call us at any of our toll-free numbers or e-mail us at [admissions@umhs-sk.net](mailto:admissions@umhs-sk.net) to arrange a personal interview so that we can give you complete information, including a Power Point presentation, and answer all your questions. Bring your parents or spouse with you.

New York 866-868-0380 if you reside in ME, NH, VT, MA, RI, CT, NJ, PA, NY, VA, WV, DE, D.C., MD, OK  
 Michigan 877-363-8558 if you reside in WI, MI, OH, IL, IN, KY, MO, MN, IA, ND, SD, NE, KS  
 California 866-735-1135 if you reside in CA (all cities outside of Southern CA), WA, OR, NV, UT, CO, ID, HI, AK, MT  
 California 877-724-1596 if you reside in Southern CA, AZ, NM  
 Florida 877-547-1520 if you reside in FL, NC, SC, AL, GA, TN, MS, LA, AR

Sincerely,

*Warren Ross*

Warren Ross

President

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09-28-2007, 09:24 PM

#1 (permalink)

[Conway](#)

Senior Member



Join Date: May 2004  
Location: NY  
Posts: 599  
Downloads: 8  
Uploads: 0

[Forum for UMHS?](#)

I think that this new school by Ross could have some interesting developments. Would it be possible to start a **forum** for the 'University of Medicine and Health Sciences'?

State University of New York at Geneseo  
Class of 2006

*Don't look down on yourself, because people have limitless possibilities.*  
---Dharma Master Cheng Yen

[Quote](#)

09-28-2007, 09:28 PM

#2 (permalink)

[eastern2western](#)

Senior Member



Join Date: Jul 2006  
Posts: 790  
Downloads: 10  
Uploads: 0

I think Ross should have just merged his new buildings with the old school instead of starting everything from scratch again because it takes a while to get accepted by the different states.

[Quote](#)

10-13-2007, 05:49 PM

#3 (permalink)

[Conway](#)

Senior Member



Join Date: May 2004  
Location: NY  
Posts: 599  
Downloads: 8  
Uploads: 0

I applied to this school as a transfer, and have since been accepted. Not completely sure if I am going there yet, but just thought I'd make it an option if it comes out to be a viable option.

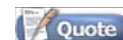
They're apparently going to contract the same people as those by Ross and AUA to do their 5th semester in Miami (as per their webpage). Thus far I haven't seen their listing on the IMED

directory yet, though. Does anyone know how long it usually takes that to get listed?

State University of New York at Geneseo  
Class of 2006

*Don't look down on yourself, because people have limitless possibilities.*

---Dharma Master Cheng Yen



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